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VIA FACSIMILE

LOUIS C. DUIMICH

DOUGLAS A. MIRO PETER S. SLOANÉ

KOUROSH SALEHI**

CHARLES P. LAPOLLA

Judge John G. Koeltl United States District Court Southern District of New York 500 Pearl Street New York, New York 10007

Re:

DAVID J. TORRENTE

CAMERON S. REUBER ---

ANGELA M. MARTUCCI

SEAN P. McMAHON

ANNA VISHEV

APPLICATION GRANTED
SO ORDERED

email@ostrolenk.com

JUDGE JOHN G. KOELTI

Jŵ

John G. Koeltl, U.S.D.

Future Communications Corporation of New York d/b/a Virtual Service v. American Security Systems, Inc., and Lawrence T. Dolin. (08 CV 1997)(JGK)

May 1, 2008

Dear Judge Koeltl:

We are the attorneys for the Defendants American Security Systems, Inc., and Lawrence T. Dolin in the above trademark infringement action.

In accordance with Your Honor's Order dated April 15, 2008, Plaintiff filed its First Amended Complaint on April 25, 2008. Service copies were received by ECF and First Class Mail. Both the ECF and mail copies appear to be missing Paragraphs 39-44. We are attempting to resolve the discrepancy with counsel for Plaintiff.

Defendants' Answer to Plaintiff's First Amended Complaint is due <u>May 2, 2008</u>. Plaintiff has also added a new cause of action. In view of the additional cause of action, the discrepancy regarding Paragraphs 39-44, because the Amended Complaint has not yet been answered, and the Defendants are filing a summary judgment motion regarding the Amended Complaint, and such motions are usually made after the Complaint is answered, Defendants respectfully request that an extension to file their Answer be granted through Wednesday, <u>May 7</u>, 2008.

OSTROLENK FABER GERB & SOFFEN, LLP

Judge John G. Koeltl May 1, 2008 Page 2

Defendants' Motion for Summary Judgment is due <u>May 2, 2008</u>. In order for Defendants' to adequately respond to and make their motion on the First Amended Complaint, Defendants respectfully request that the time for filing their Motion Summary Judgment be extended through Wednesday, <u>May 7, 2008</u>.

Defendants have no objection with extending Plaintiff's time for responding to the Motion for Summary Judgment by an additional week, through <u>June 16, 2008</u>. Likewise, if it pleases Your Honor, Defendant's reply may be extended through <u>June 30, 2008</u>.

Respectfully submitted,

OSTROLENK, FABER, GERB & SOFFEN, LLP

Robert C. Faber (RF 7020)

RCF:SPM

cc: Zeynel Karcioglu, Esq. (Attorney for Plaintiff) (via facsimile)